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February 23, 2007

Federal Trade Commission/Office of the Secretary
Room H-135 (Annex A),
600 Pennsylvania Avenue,
NW, Washington, DC 20580

Re: Appliance Labeling Rule Amendments, R511994

Burnham Hydronics is a leading United States manufacturer of residential boilers. We applaud the FTC's common-sense proposal to eliminate the requirement to include the EnergyGuide label on residential boilers and to allow electronic distribution of fact sheets.

We wholeheartedly support FTC's proposed rule regarding labeling of boilers, with some minor cautions:

On some of our boilers, our rating label currently is applied to the interior, behind an access panel. Under FTC's proposal, we would need to relocate this label to the exterior and add the AFUE data. We understand FTC's desire to make the information readily and permanently available to the consumer, who may be reluctant to remove the boiler's access panel to view an internal label, and agree that relocating the label to the outside of the boiler is in the consumer's best interest.

Because we will need to redesign dozens of labels, products, and literature, we would ask to be granted at least six months from publication of the Final Rule to fully implement the changes.

On a related note, we urge the FTC to increase its level of enforcement of existing appliance labeling rules, particularly those that require manufacturers to disclose AFUE ratings for boilers as determined by government test procedures. There has been a surge in the amount of overseas product being imported into the US with spurious and invalid claims of energy efficiency being made by the U.S. importers. Consumers are confused and companies who adhere to the regulations are being harmed.

Sincerely,

Mark Kendall
Manager, Engineering and Research